

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

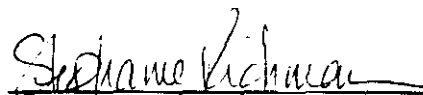
DOCKET NO. R97-1

**INTERROGATORIES OF UNITED PARCEL SERVICE
TO ALLIANCE OF NONPROFIT MAILERS WITNESS HALDI
(UPS/ANM-T1-1 through 2)**

(January 15, 1998)

Pursuant to the Commission's Special Rules of Practice, United Parcel Service hereby serves the following interrogatories and request for production of documents directed to Alliance of Nonprofit Mailers witness Haldi (UPS/ANM-T1-1 through 2).

Respectfully submitted,



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Of Counsel.

**INTERROGATORIES FROM UNITED PARCEL SERVICE
TO ALLIANCE OF NONPROFIT MAILERS WITNESS HALDI**

UPS/ANM-T1-1 Please refer to page 31, lines 10-12 of your testimony, where you conclude that Nonprofit Standard Mail (A) Regular IOCS tallies with recorded weight in excess of 16 ounces "are clearly in error, and these tallies should be disregarded."

(a) Is it not possible that the class of these IOCS tallies was recorded correctly but the weight was misrecorded?

(b) Confirm that the IOCS mail weight is not used by Postal Service witness Degen (USPS-T-12) in determining the costs of classes and subclasses of mail in his calculations. If not confirmed, please explain.

(c) Is there any other data for these IOCS tallies to suggest that the mail class has been misrecorded?

UPS/ANM-T1-2 Please confirm that the situation you describe on page 37, lines 12-14 of your testimony, in which "mail originated by nonprofit organizations may be recorded as regular rate for purposes of counting volume and revenues, but recorded as nonprofit mail if subject to an IOCS tally" is largely or entirely limited to Nonprofit Standard Mail (A) Regular and that other classes of mail are unaffected by this situation. If not confirmed, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.


Stephanie Richman

Dated: January 15, 1998
Philadelphia, PA